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Attorneys for the Federal Defendants

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

FRIENDS OF OCEANO DUNES, INC.	)	No. C 11-1476-EMC
Plaintiff,	)	
v.	)	
KEN SALAZAR, et al.	)	
Defendants.	)	

**STIPULATION AND [PROPOSED] ORDER  
 TO REGARDING DUE DATE FOR  
 RESPONSE TO COMPLAINT, INITIAL  
 CASE MANAGEMENT AND ADR  
 DEADLINES**

Federal Defendants and Plaintiff Friends of Oceano Dunes, Inc., by and through their attorneys of record, hereby stipulate, subject to approval of the Court, to the following:

1. Federal Defendants have requested, and Plaintiff has agreed, to grant Federal Defendants a 30 day extension to file a response to the First Amended Complaint. Federal Defendants response to the First Amended Complaint is continued by this Stipulation until May 31, 2011.

2. Federal Defendants agree that if they file a motion to dismiss in response to the First Amended Complaint, the hearing on such a motion will be set for ~~August 17, 2011~~. August 24, 2011 at 3:00 p.m.

3. The Initial Case Management Conference in this matter is currently set for July 13, 2011 at 1:30 pm.

4. Counsel for Plaintiff has a previously scheduled vacation during the first three weeks of June 2011 that will prevent him from working on this matter.

5. The parties have discussed this schedule conflict and request that the Court adopt the following schedule with respect to the Initial Case Management Conference and ADR Deadlines:

Initial Case Management Conference	<del>8/17/2011 at 1:30pm</del> 8/24/11 at 3:00 p.m.
Last day to file Rule 26(f) Report, complete initial FRCivP 26(a) (1) disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement	<del>8/10/2011</del> 8/17/2011
Last day to: - meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan - file ADR Certification signed by Parties and Counsel - file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference	<del>8/3/2011</del> 8/10/2011

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1 DATED: May 5, 2011

MELINDA L. HAAG  
United States Attorney

3 /s/  
4 JUAN D. WALKER  
5 Special Assistant United States Attorney  
6 Attorneys for Federal Defendants

7 DATED: May 5, 2011

LAW OFFICES OF THOMAS D. ROTH

8 /s/  
9 THOMAS D. ROTH  
10 Attorneys for Plaintiff

11 **[~~PROPOSED~~] ORDER**

12 Pursuant to stipulation, IT IS SO ORDERED. (as modified)

13 May 9, 2011

14 Dated: \_\_\_\_\_

15 EDWARD M. CHEN  
16 United States Magistrate Judge

